

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Greenbelt Division

STATUS REPORT

Pursuant to the Court's Scheduling Order dated February 10, 2003, Plaintiff Michelle White and Defendant Global Commerce and Information, Inc. (GCI) submit this Status Report to the Court.

a. Discovery has been completed, except for the following issues that the parties anticipate can be addressed in the next 2 weeks:

1. The parties agree to supplement their discovery responses, if necessary, by August 29.
2. Plaintiff's counsel requested certain documents and information at depositions on August 13 and 14, and Defendant's counsel is considering those requests.
3. At Plaintiff's deposition on August 6, Plaintiff's counsel objected to one question based on attorney-client privilege. Plaintiff's

deposition transcript was delivered to the parties on or about August 20. Pursuant to an agreement of counsel, the parties will confer early next week regarding scheduling a conference with the Court to resolve this issue.

- b. No motions are pending at this time.
- c. Defendant intends to file a motion for summary judgment. Plaintiff currently plans to file a motion for partial summary judgment. Pursuant to Local Rule 105.2(c), the parties propose the following briefing schedule:

Defendant's motion due: September 19

Plaintiff's opposition and cross-motion due October 10

Defendant's reply due: October 27

Plaintiff's sur-reply due: November 7

- d. This case will be tried by jury, and is anticipated to take 3-4 days to try.
- e. The Howard County Office of Human Rights held a mediation in this case on July 22, 2002. The parties were unable to resolve the case. After the mediation, the parties continued settlement negotiations via communications between counsel. At that time the parties remained unable to settle the case. Gary Lieber for Plaintiff and Teresa Burke Wright for Defendant conducted preliminary settlement discussions on August 21, 2003. Counsel intend to continue those discussions, and if it appears from such discussions that a meeting of parties to discuss settlement would be fruitful, the parties will schedule such a meeting in the next three weeks.

f. The parties will consider whether it would be helpful to refer this case to another judge of the Court for a settlement or other ADR conference after conducting the settlement discussions described in paragraph e above.

g. The parties do not consent to have a U.S. Magistrate Judge conduct further proceedings in this case.

h. The parties are not aware of any other matter that should be brought to the Court's attention.

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